



DLA Piper LLP (US)
1251 Avenue of the Americas, 27th Floor
New York, New York 10020-1104
www.dlapiper.com

Britt C. Hamilton
britt.hamilton@dlapiper.com
T 212.335.4837
F 212.335.4501

October 21, 2016

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Zelma Dudley v. Hanzon Homecare Services, Inc., et al.
15-cv-08821 (JFM) (RLE)

Dear Judge Furman:

We represent Defendant Melsada Morrison in a limited *pro bono* capacity in the above-captioned case. (See ECF No. 58.) We write to respectfully request a brief adjournment of the close of discovery, currently set for October 26, 2016 (ECF No. 54), to November 16, 2016, for the limited purpose of taking the deposition of Plaintiff Velma Dudley.

As explained briefly to Your Honor during the teleconference held October 19, 2016, this Firm has agreed to represent Ms. Morrison on a limited *pro bono* basis upon referral from the New York Legal Assistance Group, a legal services program recently selected to pilot a *Pro Se* Law Clinic in this District. This Firm agreed to represent Ms. Morrison on October 18, 2016, one day before her scheduled deposition and eight days before the current deadline to complete all discovery "one week after Morrison's deposition is held." See Sept. 29, 2016 Order (ECF No. 54).

Given this Firm's recent entry as limited *pro bono* counsel on Ms. Morrison's behalf, and having conferred with Plaintiff's counsel that November 16, 2016 is a mutually agreeable date on which to take Ms. Dudley's deposition, we respectfully request a brief adjournment of the discovery deadline to same date for this limited purpose.

Finally, in accordance with Your Honor's Individual Rules and Practices in Civil *Pro Se* Cases, we further advise the Court that this is the second request on behalf of Ms. Morrison to extend the deadline to complete discovery (ECF No. 40); Ms. Morrison's first request to extend the discovery deadline was granted (ECF No. 42). Counsel for Ms. Dudley consents to this request and has agreed to make Ms. Dudley available on November 16, 2016 should Your Honor grant Ms. Morrison's application.

We also note that while the parties do not currently have a date scheduled for their next appearance before the Court, several dates set forth in the Court's Order dated September 29, 2016 will be affected should Your Honor grant Ms. Morrison's application. Specifically, as noted above, the current date on which discovery will close in this matter is October 26, 2016, one week after Ms. Morrison's deposition was held. Additionally, the September 29, 2016 Order directs the parties to each submit a letter notifying the Court whether or not she intends to move for summary judgment no later than seven days after the close of discovery, and to file any such motion for summary judgment no later than thirty days after the close of discovery, with oppositions due thirty days thereafter and replies due two weeks after any opposition is filed. Should the Court grant Ms. Morrison's request for an extension of the discovery deadline, we respectfully request that the Court extend each of the aforementioned deadlines accordingly.

October 21, 2016
Page Two

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Britt C. Hamilton

Britt C. Hamilton

cc: all counsel of record (via CM/ECF)